

# Exhibit 18

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 -----X

5 SANDRA GUZMAN,

6 Plaintiff,

NO. 09 CIV. 9323 (BSJ) (RLE)

7 VS.

8 NEWS CORPORATION, NYP  
9 HOLDINGS, INC., d/b/a THE  
10 NEW YORK POST, and COL ALLAN,  
11 in his official and individual  
12 Capacities,

13 Defendants.  
14 -----X

15 VIDEOTAPED DEPOSITION  
16 OF  
17 SANDRA GUZMAN  
18 New York, New York  
19 Thursday, October 13, 2011

20 Reported by:  
21 AYLETTE GONZALEZ, CLR  
22 JOB NO. 42950  
23  
24  
25

1 SANDRA GUZMAN-10/13/11  
2 time.

3 If Ms. Guzman needs water, wants  
4 to take a break, there was no question  
5 pending. You were talking to your  
6 colleagues.

7 MR. LERNER: If the issue,  
8 Mr. Thompson, is not did you interrupt  
9 the flow of the deposition. The  
10 question is did you have an improper  
11 communication with Ms. Guzman about  
12 the subject matter of her testimony  
13 during the testimony and the record is  
14 clear that you did.

15 MR. THOMPSON: It is not clear.

16 BY MR. LERNER:

17 Q. The clarification that you just  
18 made, Ms. Guzman, when you came back on the  
19 record and said you wanted to make a  
20 clarification, was that something that you  
21 discussed during the break with Counsel?

22 MR. THOMPSON: Objection. Don't  
23 disclose what you talked to Counsel  
24 about during the break.

25 Q. Was your clarification a matter of

1 SANDRA GUZMAN-10/13/11  
2 your discussion with Counsel?

3 A. I've been instructed by my attorney  
4 not to answer your question.

5 Q. Ms. Guzman, could you look at  
6 paragraph 41 of your Amended Complaint,  
7 please.

8 A. This is the Amended Complaint?

9 MR. THOMPSON: Yes.

10 A. What page?

11 Q. Page 10.

12 A. Yes.

13 Q. Paragraph 41, you stated,  
14 "Mr. Goodstein also routinely stared at the  
15 breasts and butt of other female employees in  
16 Ms. Guzman's presence and often licked his  
17 lips while doing so."

18 Do you see that?

19 A. I do, yes.

20 Q. Nowhere in your Complaint do you  
21 state that Mr. Goodstein looked at your body  
22 in a lascivious way, correct?

23 A. He would repeatedly look at me and  
24 tell me that I look sexy and beautiful.

25 Q. No, but --

1 SANDRA GUZMAN-10/13/11

2 A. In paragraph 40.

3 Q. You're not reading from your  
4 Complaint though, correct?

5 A. I'm telling you that that's what he  
6 did and to be able to say --

7 Q. That's not what your complaint  
8 says --

9 MR. THOMPSON: Objection.

10 Q. -- right?

11 A. Okay.

12 Q. Your Complaint says that, "Les  
13 Goodstein, senior vice-president, repeatedly  
14 told Ms. Guzman that she looked sexy and  
15 beautiful."

16 You did not state, in your  
17 Complaint that he looked at you and told you  
18 that you looked sexy and beautiful, right?

19 A. He looked at me and told me that I  
20 looked sexy and beautiful.

21 Q. To be clear, you're not reading  
22 from the Complaint now, right?

23 A. I'm just telling you if we're  
24 looking at the Complaint in paragraph 40, it's  
25 very clear that he looked at me and he said --

1 SANDRA GUZMAN-10/13/11  
2 looking at me, he said I looked sexy and  
3 beautiful.

4 Q. Well, you came into the deposition  
5 room a moment ago with a clarification where  
6 you added something and what you added was  
7 that he would often stare at my breasts and  
8 body parts and comment on how sexy I looked.

9 A. Right.

10 Q. Staring at your breasts and body  
11 parts is not an allegation you made in your  
12 Complaint, right?

13 A. When he looked at me and said I was  
14 sexy and beautiful, he was staring at my body  
15 parts.

16 Q. But you didn't say in your  
17 Complaint that he stared at you right?

18 A. I didn't specifically state it.

19 Q. And when you were working with  
20 Mr. Goodstein on Tempo, Joe Rabinowitz was  
21 your supervisor; is that accurate?

22 A. I believe so.

23 Q. What was Mr. Goodstein's role on  
24 Tempo when you were working together?

25 A. He was supervising the sales